

Louis M. Phillips (#10505)
 Patrick (Rick) M. Shelby (#31963)
KELLY HART & PITRE
 One American Place
 301 Main Street, Suite 1600
 Baton Rouge, LA 70801-1916
 Telephone: (225) 381-9643
 Facsimile: (225) 336-9763
 Email: louis.phillips@kellyhart.com
 Email: rick.shelby@kellyhart.com

and

Marshall M. Searcy, Jr.
 State Bar No. 17955500
 marshall.searcy@kellyhart.com
 Michael D. Anderson
 State Bar No. 24031699
 michael.anderson@kellyhart.com
 Scott R. Wiehle
 State Bar No. 24043991
 scott.wiehle@kellyhart.com
KELLY HART & HALLMAN
 201 Main Street, Suite 2500
 Fort Worth, Texas 76102
 Telephone: (817) 332-2500
 Facsimile: (817) 878-9462

**UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF TEXAS
 LUBBOCK DIVISION**

IN RE:	§	Case No.: 18-50214-rlj11
	§	(Lead Case)
REAGOR-DYKES MOTORS, LP,¹	§	
	§	
DEBTOR	§	Chapter 11
	§	
IN RE: REAGOR-DYKES	§	Case No. 18-50215-rlj11
IMPORTS, LP	§	(Jointly Administered Under
	§	Case No. 18-50214)
	§	
DEBTOR	§	
IN RE: REAGOR-DYKES	§	Case No. 18-50216-rlj11
AMARILLO, LP	§	(Jointly Administered Under
	§	Case No. 18-50214)

¹ Pursuant to this Court's *Order Regarding Filing of Pleadings and Directing Joint Administration of Cases* [Dkt. No. 34], the following pleading is filed in the lead case, Case No. 18-50214-rlj11.

	§	
	§	
	§	
DEBTOR	§	
IN RE: REAGOR-DYKES	§	Case No. 18-50217-rlj11
AUTO COMPANY,	§	(Jointly Administered Under
LP	§	Case No. 18-50214
	§	
DEBTOR	§	
IN RE: REAGOR-DYKES	§	Case No. 18-50218-rlj11
PLAINVIEW, LP	§	(Jointly Administered Under
	§	Case No. 18-50214)
	§	
DEBTOR	§	
IN RE: REAGOR-DYKES	§	Case No. 18-50219-rlj11
FLOYDADA, LP	§	(Jointly Administered Under
	§	Case No. 18-50214)
	§	
DEBTOR	§	

**MOTION FOR LEAVE TO WAIVE REQUIREMENT OF LOCAL BANKRUPTCY
RULE 2090-4(a) FOR DESIGNATION OF LOCAL COUNSEL**

Undersigned counsel, Louis M. Phillips and Patrick (Rick) M. Shelby, file this *Motion for Leave to Waive Requirement of Local Bankruptcy Rule 2090-4(a) for Designation of Local Counsel* (the “***Motion***”), and in support of the Motion represent as follows:

1. As set forth in undersigned counsel’s Notices of Appearance and Request for Notice [Dkt. No. 53] undersigned counsel represents interested party, Bart Reagor (“***Reagor***”) in the above-captioned jointly administered bankruptcy cases.

2. Undersigned counsel Messrs Phillips and Shelby are not admitted to the Northern District of Texas bar, but are members of the law firm Kelly Hart & Hallman, LP (“***Kelly Hart***”) which does business in the State of Louisiana as Kelly Hart & Pitre. Kelly Hart’s main office is located in this District.

3. Additionally, certain Kelly Hart attorneys who are admitted to practice in the State of Texas and this District, have also filed Notices of Appearance and Request for Notice

[Dkt. Nos. 85] for interested party Reagor. While these Kelly Hart attorneys are members of the Northern District of Texas bar, Kelly Hart's Fort Worth, Texas office is not located within 50 miles of Lubbock, Texas.

4. According to Local Bankruptcy Rule 2090-4(a), undersigned counsel hereby request leave to proceed without local counsel in connection with seeking *pro hac vice* admission to represent Reagor in the captioned proceedings.²

5. The Kelly Hart attorneys who also represent Reagor that are admitted to this District are located in Fort Worth, Texas and submit that they are able to present and argue Reagor's position at any hearing called by the Court on short notice.

6. For the reasons set forth herein, undersigned counsel hereby move this Court for the entry of an order granting leave to proceed in representing Reagor in the above-captioned bankruptcy cases without local counsel.

Dated: August 14, 2018

Respectfully Submitted:

/s/ Louis M. Phillips

Louis M. Phillips (#10505)

Patrick (Rick) M. Shelby (#31963)

KELLY HART & PITRE

One American Place

301 Main Street, Suite 1600

Baton Rouge, LA 70801-1916

Telephone: (225) 381-9643

Facsimile: (225) 336-9763

Email: louis.phillips@kellyhart.com

Email: rick.shelby@kellyhart.com

and

² Contemporaneously herewith, Louis M. Phillips and Patrick (Rick) M. Shelby are filing Motions to Appear Pro Hac Vice.

Marshall M. Searcy, Jr.
State Bar No. 17955500
marshall.searcy@kellyhart.com
Michael D. Anderson
State Bar No. 24031699
michael.anderson@kellyhart.com
Scott R. Wiehle
State Bar No. 24043991
scott.wiehle@kellyhart.com
KELLY HART & HALLMAN
201 Main Street, Suite 2500
Fort Worth, Texas 76102
Telephone: (817) 332-2500
Facsimile: (817) 878-9462

Counsel for Bart Reagor

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that a copy of the forgoing pleading was served on this August 14, 2018 through this Court's CM/ECF system on those parties receiving notice through this Court's CM/ECF system listed on the attached mailing matrix.

/s/ Louis M. Phillips
Louis M. Phillips (#10505)